

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SECURITIES AND EXCHANGE COMMISSION	§	
	§	
V.	§	Case No. 6:23-cv-00321
	§	
ROY W. HILL, et al.	§	

UNOPPOSED MOTION FOR PROTECTIVE ORDER

Receiver Albert C. Black III (“Receiver”) seeks entry of a protective order in this matter, respectfully stating:

1. The Receiver has requested certain representatives of investors to provide voluntary production of documents needed to verify claims made by such investors. The documents include personal information. However, the representatives have agreed to produce the requested documents subject to a protective order.

2. Therefore, the Receiver requests that the Court enter a protective order in the form submitted herewith. The Receiver is tendering the standard form for this district.

Conclusion

WHEREFORE, the Receiver prays that the Court enter the proposed order accompanying this motion.

Respectfully submitted,

/s/ Dennis Roossien

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COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify that this motion is not opposed by the Plaintiff, and that I have made numerous attempts to obtain a position statement from counsel for Roy Hill, who has indicated several times that he would check with his client, but has not stated a position. While it appears likely he will not object, this matter cannot wait indefinitely for him to so advise.

/s/ Dennis Roossien

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June, 2024, this document will be served by the Clerk's electronic procedures immediately upon its filing on all counsel of record.

/s/ Dennis Roossien